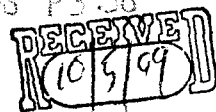




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October 1, 1999

The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statement:

- (1) Iplex is a special combination formula designed to support the healthy functioning of the eyes.*

This statement is made for a dietary supplement containing a proprietary blend of arrowroot flour, inositol, calcium lactate, bovine eye PMGTM extract, phosphoric acid, dried buckwheat (leaf) juice, buckwheat (seed), veal bone PMGTM extract, carrot (root), bovine liver, magnesium citrate, porcine stomach, choline bitartrate, nutritional yeast, bovine adrenal, defatted wheat (germ), alfalfa flour, bovine kidney, dried alfalfa juice, allantoin, mushroom, manganese glycerophosphate, bovine adrenal CytosolTM extract, bovine brain, bovine bone, *dl*-methionine, oat flour, soy bean lecithin, veal bone, mixed tocopherols, carrot oil, and peanut (bran). Other ingredients include gelatin, water, ascorbic acid, potassium para-aminobenzoate, niacinamide, natural colors, calcium stearate, riboflavine 5-phosphate, vitamin A palmitate, and pyridoxal 5-phosphate. And the name of the product is Iplex®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann M. Holden

Ann Holden
Standard Process Inc.



975-0162

STANDARD PROCESS INC. • 1200 WEST ROYAL LEE DRIVE • PALMYRA, WI 53156 • 414-495-2122 • FAX 414-495-2512 • 1-800-848-5061

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